

United States District Court
Eastern District of Michigan

Heather Kerchen, Lori Kerchen, and
Dale Kerchen,
Plaintiffs,

Case no: 4:22-cv-12492

vs.

Hon. Shalina D. Kumar
Mag. David R. Grand

Christian Raphaelides (in his
individual and official capacities),
University of Michigan, James H.
Woods (in his individual and official
capacities), & Unknown Does (in
their individual—and where
appropriate—official capacities),
Defendants.

Dustyn Coontz (P80102)

Attorney for Plaintiffs
1100 W. Saginaw St.
Suite 4A
Lansing, MI 48915
(517) 940-8004
dc@coontzlaw.com

Brian M. Schwartz (P69018)

Lawrence T. García (P54890)

Sydney G. Rohlicek (P85655)

Attorneys for Defendants University
of Michigan and Dr. James H. Woods
MILLER, CANFIELD, PADDOCK
AND STONE, P.L.C.

150 W. Jefferson Ave., Suite 2500
Detroit, MI 48226

(313) 963-6420

schwartzb@millercanfield.com

garcia@millercanfield.com

rohlicek@millercanfield.com

**STIPULATION AND ORDER TO EXTEND DEADLINE TO FILE A
RESPONSE TO DEFENDANTS' UNIVERSITY OF MICHIGAN AND DR.
JAMES WOODS' MOTION TO DISMISS**

It is hereby stipulated by and between the parties that the Plaintiffs may have

additional time within which to respond to the Defendants' University of Michigan (*University*) and Dr. James Woods' (*Dr. Woods*) Motion to Dismiss.

Good cause exists for this extension as Plaintiff's counsel was in a murder trial from December 8 to December 13, 2022. Plaintiff's counsel subsequently contacted Covid last December 17, 2022. Due to these events, in addition to the holidays, Plaintiff's counsel requests a one-week extension in order to prepare and file for a response. Counsel for Defendants' University and Dr. Woods agrees to the one-week extension.

WHEREFORE, the parties hereby STIPULATE that the last day for Plaintiff to file a response to the Defendants' Motion to Dismiss is Thursday, January 12, 2023.

Dated: January 4, 2023

by: /s/ Dustyn Coontz (P80102)
Attorney for Plaintiffs
1100 W. Saginaw St.
Suite 4A
Lansing, MI 48915
(517) 940-8004
dc@coontzlaw.com

Dated: January 4, 2023

by: /s/ Lawrence T. García (P54890)
Attorney for Defendants University of
Michigan and Dr. James H. Woods
MILLER, CANFIELD, PADDOCK
AND STONE, P.L.C
150 W. Jefferson Ave., Suite 2500
Detroit, MI 48226
(313) 963-6420
garcia@millercanfield.com

ORDER

Good cause having shown, the Court hereby ORDERS that the Plaintiffs file a response to Defendants' University and Dr. Woods' Motion to Dismiss on January 12, 2023.

IT IS SO ORDERED.

Dated: January 11, 2023

s/Shalina D. Kumar
Hon. Shalina D. Kumar
United States District Judge